

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:23-CV-21378-RUIZ/BECERRA

CRAIG BUREY,

Plaintiff,

vs.

NOMI HEALTH, INC.,  
SBP STAFFING AND RECRUITING LLC,  
SB PORT VENTURES LLC,

Defendants.

/

**PLAINTIFF'S STATEMENT OF CLAIM**

Plaintiff, Craig Burey, pursuant to the Court's Order entered on August 22, 2023 [ECF No. 24], files this Statement of Claim based on the information known to Plaintiff and estimates as follows:

***Preliminary Statement***

This Statement of Claim is not to be construed as a demand, nor as an exact quantification of her damages, but merely as a case management tool required by the Court. *See Calderon v. Baker Concrete Const., Inc.*, 771 F.3d 807, 811 (11<sup>th</sup> Cir. 2014) ("That document is an extra-Rules practice used by the district court for its convenience and to aid in case management. It does not have the status of a pleading and it is not an amendment under Rule 15 of the Federal Rules of Civil Procedure.")

***Information Requested by the Court***

1. Plaintiff does not have all of the time and pay records from his employment at this time, and so he must estimate the hours that worked, the pay that received for those hours, and the corresponding wages due.
2. Plaintiff prepared this Statement of Claim with the assistance of counsel.
3. Plaintiff estimates that he is owed **\$3,882.26**.
4. Please refer to the attached spreadsheet for how Plaintiff calculated this amount.
5. Plaintiff claims that he is owed overtime wages worked **between March 14, 2022 and April 2, 2023**.
6. Plaintiff estimates that he is owed \$3,882.26 in **underpaid overtime wages**.
7. Plaintiff also seeks liquidated in an amount equal to the above underpaid overtime wages plus reasonable attorneys' fees and costs pursuant to the FLSA.
8. Plaintiff's Statement of Claim is based upon the information currently known and/or available.
9. Plaintiff reserves the right to amend this Statement of Claim based upon additional information provided by Defendants, through discovery, and/or as additional/different information becomes known.
10. This Statement of Claim does not include any computation of for damages other than those sought in the operative/pending Complaint and is subject to revision through the course of discovery and/or the amendment of the Complaint.
11. The foregoing amounts are subject to increase commensurate with the expenditure of additional time, effort, and expense in this matter.

Respectfully submitted this 28th day of August 2023.

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